

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

06-11-07
03:17 PM

| | | |
|-------------------------------------|---|------------------------|
| Order Instituting Rulemaking to |) | Rulemaking 04-04-026 |
| Implement the California Renewables |) | (Filed April 22, 2004) |
| Portfolio Standards Program. |) | |
| |) | |

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
COMMENTS ON PROPOSED DECISION REGARDING
PETITION FOR MODIFICATION OF DECISION 04-06-014**

AIMEE M. SMITH
101 Ash Street, HQ-12
San Diego, CA 92101
Phone: (619) 699-5042
Fax: (619) 699-5027
E-mail: amsmith@sempira.com

Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY

June 11, 2007

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Implement the California Renewables
Portfolio Standards Program.

)
) Rulemaking 04-04-026
) (Filed April 22, 2004)
)
)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
COMMENTS ON PROPOSED DECISION REGARDING
PETITION FOR MODIFICATION OF DECISION 04-06-014**

**I.
INTRODUCTION AND BACKGROUND**

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), San Diego Gas & Electric Company (“SDG&E”) hereby submits these comments concerning the proposed decision of ALJ Mattson, *Opinion on Petition for Modification of Decision 04-06-014 Regarding Process for Changing and Lifting Restrictions on Designated Standard Terms and Conditions*, issued on May 22, 2007 (the “PD”).

The PD responds to the petition for modification (“PFM”) filed by Pacific Gas & Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) seeking clarification of the process by which parties may revise the standard terms and conditions (“STCs”) adopted in D.04-06-014 for renewable portfolio standard (“RPS”) contracts, including those STCs designated as “non-modifiable.” The PD rejects the request that restrictions on negotiation of STCs be eliminated, and provides guidance regarding the extent to which the advice letter process may be used to seek approval of RPS contracts.

As SDG&E explains below, the PD must be revised to provide greater clarity concerning the procedural vehicles available for seeking revisions to non-modifiable STCs proposed on a generic basis versus those proposed in an individual case. In addition, modification of the PD is required in order to make clear which RPS contracts may be submitted for approval via advice letter and to provide more definitive direction concerning when the need for an application filing is triggered.

II.

THE PD MUST BE REVISED TO CLARIFY THE PROCEDURAL VEHICLES AVAILABLE FOR SEEKING REVISIONS TO NON-MODIFIABLE STANDARD TERMS ON A GENERIC VERSUS INDIVIDUAL BASIS

The PD appears to establish two separate procedural tracks for requesting approval of a revision to “non-modifiable” STC. Where the revision is “generic” – *i.e.*, where the party seeking the revision intends the revision to apply uniformly to all future RPS contracts entered into by that party – the PD identifies the preferred procedural vehicles for seeking approval of such generic change as (i) the filing of a petition for modification of D.04-06-014; (ii) filing late comments on the August 21, 2006 Scoping Memo in R.06-05-027, which identified STCs as an issue upon which parties should comment; or (iii) requesting that the issue of STCs be included in an amended or future scoping memo in R.06-05-027 or a successor RPS proceeding and proposing the recommended revision in that context.^{1/} Where a revision appears in an individual RPS contract as the result of negotiation and is not intended to be incorporated into all future RPS contracts, the PD concludes that parties may “present those changes by an [Advice Letter] for Commission review of the contract.”^{2/}

^{1/} PD, p. 14.

^{2/} *Id.* at p. 27.

While the distinction drawn by the Commission between procedural treatment of revisions to non-modifiable STCs proposed on a generic basis versus those proposed in an individual case is fairly clear from the discussion contained in the PD, SDG&E notes that minor revisions to the PD would remove any potential for confusion on this point. Specifically, as detailed in Attachment A hereto, SDG&E recommends that the PD be revised to include an express statement to the effect that the PFM/Scoping Memo procedural approach is appropriate where the revision sought is generic in nature. This will avoid misinterpretation of the decision as requiring a PFM or other more time-consuming process where a party seeks to revise a non-modifiable STC contained in an individual contract and does not intend to incorporate the provision in all future RPS contracts.

III. THE PD MUST BE REVISED TO CLARIFY WHICH RPS CONTRACTS MAY BE SUBMITTED FOR APPROVAL VIA ADVICE LETTER

The PD provides that “each RPS contract may be submitted for Commission consideration by AL.”^{3/} It is not entirely clear, however, to which RPS contracts this statement refers. Specifically, the PD does not address whether the advice letter process may be used for RPS contracts resulting from bilateral negotiations or from non-RPS all-source solicitations. Accordingly, SDG&E requests that the PD be revised to clarify whether the advice letter process may be used for (i) RPS contracts resulting from RPS solicitations; (ii) RPS contracts resulting from bilateral negotiations; and (iii) RPS contracts resulting from all-source solicitations. For the sake of consistency and in order to facilitate execution of RPS contracts in order to meet the 20% by 2010 goal, SDG&E recommends that *all* RPS contracts, regardless of source, be subject to the same advice

^{3/} *Id.* at p. 36, Conclusion of Law #5.

letter approval process and that approval via the application process be required only where the Energy Division concludes that the advice letter process is not appropriate.

**IV.
THE PD MUST BE REVISED TO PROVIDE CLEAR DIRECTION
CONCERNING WHEN THE NEED FOR AN APPLICATION
FILING IS TRIGGERED**

The PD endorses the view that “the [Advice Letter] process is the most appropriate and expeditious way to consider RPS contracts, *including those with STCs which vary from those currently designated as non-negotiable.*”^{4/} Eliminating needless delay and inefficiencies in the RPS contract approval process is critical to the utilities’ ability to achieve the 20% by 2010 target and, indeed, to the ultimate success of the RPS program. The PD acknowledges this fact by ensuring streamlined review of RPS contracts – including where approval is sought of RPS contracts proposing revisions to non-modifiable STCs. The PD creates confusion on this point, however, by offering the conflicting conclusion that that in most instances Advice Letters seeking approval of RPS contracts that include revisions to non-modifiable STC(s) must be rejected and that such contracts must be submitted via the application process.^{5/}

The PD directs the Energy Division to reject Advice Letters “that present a material issue of fact or law, a material issue relative to public policy or the public interest, or otherwise present an issue which justifies further scrutiny which is not addressed best using the AL process.”^{6/} This standard, which is extremely broad and ill-defined to begin with, when coupled with an apparent bias against approval of Advice

^{4/} *Id.* at p. 26 (emphasis added).

^{5/} *See, id.* at p. 29.

^{6/} PD, pp. 36, Conclusion of Law #5.

Letters submitting contracts with revised non-modifiable STCs,^{7/} would result in a de facto requirement that all such contracts be submitted via application. This plainly conflicts with the PD's conclusion that the Advice Letter process is the most appropriate and expeditious way to consider RPS contracts.

The PD is contradictory in that it simultaneously leaves the door open for submittal of contracts with revised non-modifiable terms via Advice Letter, and effectively shuts the door by essentially instructing the Energy Division to reject such Advice Letters. This chilling effect of this latter directive is exacerbated by the PD's caution that the Commission might eliminate the Advice Letter approach altogether if it is used "excessively or unreasonably."^{8/} Because the standard for determining when an Advice Letter is inappropriate and an application is required provides little concrete guidance, a sense of what contracts are appropriate for submittal via Advice Letter can be developed only through trial and error. The Commission's warning, however, creates a strong disincentive to even explore the possibility of submitting a contract proposing a revision to a non-modifiable STC via Advice Letter. Thus, parties may forego the Advice Letter process and accept the resulting delay even in those instances use of the Advice Letter process is entirely appropriate.

In order to eliminate the internal conflict in the PD and to diminish the potential harm of an overly-vague standard for determining when a contract proposing a revision to a non-modifiable STC must be submitted via application, the PD should be modified in the following respects: first, the PD should be revised to direct the Energy Division to

^{7/} See, *id.* at p. 29 ("We would generally be surprised if . . . change in one or more STCs did not raise a material issue of fact or law, or an important policy issue. If so, in most cases we would expect Energy Division to reject the advice letter, with the recommendation that the matter be submitted as an application").

^{8/} *Id.* at pp. 36, Conclusion of Law #5.

provide guidance to parties prior to the filing of a contract for approval regarding whether or not a proposed revision to a non-modifiable term will necessitate filing of an application. Second, to the extent possible, the adopted decision should expressly identify revisions to non-modifiable STCs that would or would not trigger the application filing requirement. For example, the PD should be revised to expressly state that the following revisions to non-modifiable STCs will not require filing of an application: (i) deletion of provisions regarding SEP funds when no SEP funds will be sought; and (ii) adjustment of terms used in non-modifiable STC in order to conform to defined terms used elsewhere in the contract.

Finally, the Commission should remove the discussion in the PD that appears to prejudice the appropriateness of use of the advice letter process, or should at least qualify the discussion with the requested direction concerning what non-modifiable terms may be revised without creating a need for an application filing. With these revisions, the PD will achieve its aim of providing clear guidelines for to the parties concerning use of the Advice Letter process and establishing effective and efficient procedures for obtaining approval of RPS contracts.

///

///

///

**V.
CONCLUSION**

For the reasons set forth above, SDG&E recommends adoption of the clarifications and modifications described herein and listed in Attachment A hereto.

Respectfully submitted this 11th day of June, 2007.

/s/ Aimee M. Smith
AIMEE M. SMITH
101 Ash Street, HQ-12
San Diego, California 92101
Telephone: (619) 699-5042
Facsimile: (619) 699-5027
amsmith@sempra.com

Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT A

Proposed Conclusions of Law:

2. An LSE may propose **generic (i.e., applicable to all future RPS contracts)** changes to STCs (either the “starting” language for a STC that may be modified, or the language of a non-modifiable STC) in any reasonable forum, with certain forums preferred and expected to be used (e.g., petition for modification, comments on Scoping Memo issue regarding STCs), but in any forum at least two things are necessary (i.e., (i) clear identification of STC at issue, concrete proposal, support for change and (ii) notice and opportunity to comment, with consideration of whether the result applies to one, some or all LSEs).

5. Each RPS contract **(whether the result of an RPS solicitation, bi-lateral negotiation or an all-source solicitation)** may be submitted for Commission consideration by AL, but Energy Division should reject ALs that present a material issue of fact or law, a material issue relative to public policy or the public interest, or otherwise present an issue which justifies further scrutiny which is not addressed best using the AL process. **The Energy Division shall, upon request, provide guidance to the parties prior to the filing of a contract for approval regarding whether a proposed revision to a non-modifiable term necessitates filing of an application**

6. Parties may agree to a change in an otherwise non-modifiable STC in an individual contract and submit the contract by AL for Commission consideration, but such cases should be limited and should be the exception, not the rule. Where the AL process is not appropriate, parties may submit such contracts for approval via the application process.

___ The following revisions to non-modifiable STCs will not require filing of an application: (i) deletion of provisions regarding SEP funds when no SEP funds will be sought; and (ii) adjustment of terms used in non-modifiable STC in order to conform to defined terms used elsewhere in the contract.

CERTIFICATE OF SERVICE

I hereby certify that a copy of **SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) COMMENTS ON PROPOSED DECISION REGARDING PETITION FOR MODIFICATION OF DECISION 04-06-014** has been electronically mailed to each party of record of the service list in R.04-04-026. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judges Anne E. Simon and Burton Mattson and Commissioner Michael R. Peevey.

Executed this 11th day of June, 2007 at San Diego, California.

/s/ Jenifer E. Nicola
Jenifer E. Nicola

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0404026 - PUC - OIR TO IMPLEME

Filer: CPUC

List Name: LIST

Last changed: June 8, 2007

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

Appearance

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH STREET, NW, SUITE 800
WASHINGTON, DC 20005

RHONE RESCH
SOLAR ENERGY INDUSTRIES ASSOCIATION
805 FIFTEENTH STREET, N.W., SUITE 510
WASHINGTON, DC 20005

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH, FL 33408

DAVID SAUL
COO
SOLEL, INC.
701 NORTH GREEN VALLEY PKY, STE 200
HENDERSON, NV 89074

DAVID L. HUARD
ATTORNEY AT LAW
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367

GREGORY S. G. KLATT
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102

CATHY KARLSTAD

AIMEE M. SMITH

SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101

FREDERICK M. ORTLIEB
OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1100
SAN DIEGO, CA 92101

THEODORE ROBERTS
ATTORNEY AT LAW
SEMPRA GLOBAL
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.
58470 HWY 371
PO BOX 391909
ANZA, CA 92539

TAMLYN M. HUNT
ENERGY PROGRAM DIRECTOR
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2/F
SANTA BARBARA, CA 93101

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
949 EAST ANNADALE AVE., A210
FRESNO, CA 93706

DAVID ORTH
KINGS RIVER CONSERVATION DISTRICT
4886 EAST JENSEN AVENUE
FRESNO, CA 93725

JANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF CALIFORNIA
64 LOS ALTOS SQUARE
LOS ALTOS, CA 94022

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS, CA 94024

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

STEPHEN A.S. MORRISON
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM 234
SAN FRANCISCO, CA 94102

F. JACKSON STODDARD
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5125
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

EVELYN C. LEE
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL DROP 30A
SAN FRANCISCO, CA 94105

WILLIAM H. CHEN
CONSTELLATION NEW ENERGY, INC.
SPEAR TOWER, 36TH FLOOR

JP ROSS
DEPUTY DIRECTOR
THE VOTE SOLAR INITIATIVE

ONE MARKET STREET
SAN FRANCISCO, CA 94105

300 BRANNAN STREET, SUITE 609
SAN FRANCISCO, CA 94107

BRIAN CRAGG
ATTORNEY AT LAW
GOODIN, MAC BRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JOSEPH M. KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111-5802

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121

ARNO HARRIS
RECURRENT ENERGY, INC.
220 HALLECK ST., SUITE 220
SAN FRANCISCO, CA 94129

GABE PETLIN
3 PHASES ENERGY SERVICES
PRESIDIO OF SAN FRANCISCO
6 FUNSTON AVENUE
SAN FRANCISCO, CA 94129

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PRESIDIO BUILDING 97
PO BOX 29512
SAN FRANCISCO, CA 94129

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
2633 WELLINGTON CT.
CLYDE, CA 94520

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

JACK PIGOTT
GEN 3 SOLAR, INC.
31302 HUNTSWOOD AVENUE
HAYWARD, CA 94544

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL AVE., 5TH FLOOR
WALNUT CREEK, CA 94556

LINDA Y. SHERIF
ATTORNEY AT LAW
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710

R. THOMAS BEACH
PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062

MEGAN MACNEIL MYERS
ATTORNEY AT LAW
LAW OFFICES OF MEGAN MACNEIL MYERS
PO BOX 638
LAKEPORT, CA 95453

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

JAMES WEIL
DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 37
COOL, CA 95614

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814

JAN MCFARLAND
AMERICANS FOR SOLAR POWER
1100 11TH STREET, SUITE 323
SACRAMENTO, CA 95814

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

JESSICA NELSON
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA, CA 96122-7064

RYAN FLYN
PACIFICORP
825 NE MULTNOMAH STREET
PORTLAND, OR 97232

KAREN MCDONALD
POWEREX CORPORATION
1400,
666 BURRAND STREET
VANCOUVER, BC V6C 2X8
CANADA

Information Only

JACLYN MARKS
29 GARDEN ST., 507
CAMBRIDGE, MA 02138

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE

RIDGEWOOD, NJ 07450

ROGER BERLINER
ATTORNEY AT LAW
BERLINER LAW PLLC
1747 PENNSYLVANIA AVE. N.W., STE 825
WASHINGTON, DC 20006

CHRISTOPHER O'BRIEN
SHARP SOLAR
VP STRATEGY AND GOVERNMENT RELATIONS
3808 ALTON PLACE NW
WASHINGTON, DC 20016

VENKAT SURAVARAPU
ASSOCIATES DIRECTOR
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
1150 CONNECTICUT AVENUE NW, STE. 201
WASHINGTON, DC 20036

KEVIN PORTER
EXETER ASSOCIATES, INC.
SUITE 310
5565 STERRETT PLACE
COLUMBIA, MD 21044

TODD JAFFE
ENERGY BUSINESS BROKERS AND CONSULTANTS
3420 KEYSER ROAD
BALTIMORE, MD 21208

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801

MARY COLLINS
POLICY ADVISOR TO COMMISSIONER LIEBERMAN
ILLINOIS COMMERCE COMMISSION
160 NORTH LASALLE STREET, STE. C-800
CHICAGO, IL 60601

JASON ABIECUNAS
BLACK & BEATCH GLOBAL RENEWABLE ENERGY
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK, KS 66211

RYAN PLETKA
RENEWABLE ENERGY PROJECT MANAGER
BLACK & VEATCH
11401 LAMAR
OVERLAND PARK, KS 66211

JONATHAN JACOBS
PA CONSULTING GROUP
390 INTERLOCKEN CRESCENT, SUITE 410
BROOMFIELD, CO 80021

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004

CHRISTOPHER HILEN
ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89511

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL RD.
RENO, NV 89511

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520

JOE GRECO
CAITHNESS OPERATING COMPANY
9590 PROTOTYPE COURT, SUITE 200
RENO, NV 89521

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES, CA 90013

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION STREET
PASADENA, CA 91103

TOM HAMILTON
MANAGING PARTNER
ENERGY CONCIERGE SERVICES
321 MESA LILA RD
GLENDALE, CA 91208

JACK MCNAMARA
ATTORNEY AT LAW
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS, CA 91376-1380

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

FRANK W. HARRIS
REGULATORY ECONOMIST
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE
ROSEMEAD, CA 91770

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JAMES B. WOODRUFF
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, SUITE 342, GO1
ROSEMEAD, CA 91770

LIZBETH MCDANNEL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD, CA 91770

ABBAS M. ABED
ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
402 WEST BROADWAY, SUITE 400
SAN DIEGO, CA 92101

LINDA WRAZEN
SEMPRA ENERGY REGULATORY AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101

THOMAS P. CORR
SEMPRA ENERGY GLOBAL ENTERPRISES
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123

CHARLES MANZUK
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP 32D
SAN DIEGO, CA 92123

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO, CA 92123-1530

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130-2592

MWIRIGI IMUNGI
15615 ALTON PARKWAY
IRVINE, CA 92618

CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626

JUDE LEBLANC
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626

DAVID OLSEN
IMPERIAL VALLEY STUDY GROUP
3804 PACIFIC COAST HIGHWAY
VENTURA, CA 93001

HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE, CA 93501

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

DAN ADLER
DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
5 THIRD STREET, SUITE 1125
SAN FRANCISCO, CA 94103

MICHAEL A. HYAMS
POWER ENTERPRISE-REGULATORY AFFAIRS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4TH FLOOR
SAN FRANCISCO, CA 94103

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

DOUGLAS E. COVER
ENVIRONMENTAL SCIENCE ASSOCIATES
225 BUSH STREET, SUITE 1700
SAN FRANCISCO, CA 94104

KAREN TERRANOVA

SETH D. HILTON

ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104

STOEL RIVES
111 SUTTER ST., SUITE 700
SAN FRANCISCO, CA 94104

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104

CHRIS ANN DICKERSON, PHD
FREEMAN, SULLIVAN & CO.
100 SPEAR ST., 17/F
SAN FRANCISCO, CA 94105

DEBORAH BROCKETT
CONSULTANT
NAVIGANT CONSULTING, INC.
SPEAR STREET TOWER, SUITE 1200
ONE MARKET STREET
SAN FRANCISCO, CA 94105

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B13L
SAN FRANCISCO, CA 94105

LENNY HOCHSCHILD
EVOLUTION MARKETS, LLC
RENEWABLE ENERGY MARKETS
425 MARKET STREET, SUITE 2200
SAN FRANCISCO, CA 94105

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105-1814

JON WELNER
PAUL HASTINGS JANOFFSKY & WALKER LLP
55 SECOND STREET, 24TH FLOOR
SAN FRANCISCO, CA 94105-3441

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

ROBERT B. GEX
ATTORNEY AT LAW,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

STANDISH O'GRADY
FRIENDS OF KIRKWOOD ASSOCIATION
31 PARKER AVENUE
SAN FRANCISCO, CA 94118

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

GRACE LIVINGSTON-NUNLEY
ASSISTANT PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177

NINA BUBNOVA
CASE MANAGER
PACIFIC GAS AND ELECTRIC COMPANY

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A

PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

SAN FRANCISCO, CA 94177-0001

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016

NICOLAS PROCOS
ALAMEDA POWER & TELECOM
2000 GRAND STREET
ALAMEDA, CA 94501-0263

KEITH WHITE
931 CONTRA COSTA DRIVE
EL CERRITO, CA 94530

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, SUITE 210
WALNUT CREEK, CA 94597

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, 613
WALNUT CREEK, CA 94598-3535

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

BARRY H. EPSTEIN
FITZGERALD, ABBOTT & BEARDSLEY, LLP
1221 BROADWAY, 21ST FLOOR
OAKLAND, CA 94612

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
146 VICENTE ROAD
BERKELEY, CA 94705

RYAN WISER
BERKELEY LAB
MS-90-4000
ONE CYCLOTRON ROAD
BERKELEY, CA 94720

DEREK DENNISTON
THE DENNISTON GROUP, LLC
101 BELLA VISTA AVE
BELVEDERE, CA 94920

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVENUE
CORTE MADERA, CA 94925

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

C. SUSIE BERLIN
MCCARTHY & BERLIN LLP
100 PARK CENTER PLAZA, STE. 501
SAN JOSE, CA 95113

DAVID OLIVARES
ELECTRIC RESOURCE
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616

DAVID MORSE
1411 W, COVELL BLVD., SUITE 106-292
DAVIS, CA 95616-5934

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

GRANT A. ROSENBLUM
STAFF COUNSEL
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

KARLY MCCRORY
SOLAR DEVELOPMENT
2424 PROFESSIONAL DRIVE
ROSEVILLE, CA 95677

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS, CA 95762

BRUCE MCLAUGHLIN
ATTORNEY AT LAW
BRAUN & BLAISING P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES, INC.
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

WILLIAM W. WESTERFIELD III
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET MS 75
SACRAMENTO, CA 95817

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
3310 EL CAMINO AVE. RM 300
SACRAMENTO, CA 95821

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843

CATHIE ALLEN
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 2000
PORTLAND, OR 97232

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH,
PORTLAND, OR 97232

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660

TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND STREET
VANCOUVER, WA 98683

State Service

AARON J. JOHNSON
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
ROOM 4202
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE E. SIMON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5024
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE

BURTON MATTSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5104
505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELLEN S. LEVINE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5028
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANE WHANG
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5029
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARK R. LOY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NANCY RYAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NILGUN ATAMTURK
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NOEL OBIORA
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL DOUGLAS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SHANNON EDDY
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUSANNAH CHURCHILL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUZANNE KOROSEC
CALIFORNIA ENERGY COMMISSION
MS-31
1516 9TH STREET
SACRAMENTO, CA 95184

JAMES MCMAHON
SENIOR ENGAGEMENT MANAGER
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

CLARE LAUFENBER GALLARDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO, CA 95814

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO, CA 95814

ROSS MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

THOMAS FLYNN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)